

ACH VENDOR PAYMENT ENROLLMENT

OMB Control Number 1240-0NEW

OMB Expiration Date: XX/XX/XXXX

**SUPPORTING STATEMENT FOR
ACH VENDOR PAYMENT ENROLLMENT**

OMB CONTROL NO. 1240-0NEW

This ICR seeks to obtain approval for a new collection.

A. JUSTIFICATION

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The Office of Workers' Compensation Programs (OWCP) is the agency responsible for administration of the Federal Employees' Compensation Act (FECA), 5 U.S.C. 8101 et seq., the Black Lung Benefits Act (BLBA), 30 U.S.C. 901 et seq., the Energy Employees Occupational Illness Compensation Program Act of 2000 (EEOICPA), 42 U.S.C. 7384 et seq., and the Longshore and Harbor Workers' Compensation Act, 33 U.S.C 901 et seq. These statutes require OWCP to pay for appropriate medical and vocational rehabilitation services provided to beneficiaries. In order for OWCP's bill processing contractor to pay providers for these services with its bill processing system, providers must complete and submit an ACH Vendor payment system form. This form is required under the provision of 31 U.S.C. 3322 and 31 CFR 210. The regulations implementing the above statutes that OWCP administers permit the collection of information necessary to allow its billing contractor to process and pay bills submitted by providers of medical and vocational rehabilitation services. (20 CFR 10.801, 30.701, 725.704, 725.705 and 725.714).

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The information provided is used by the bill processing contractor on behalf of the programs to direct payment to providers of medical and vocational rehabilitation services, accurately and in a timely manner.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.**

In accordance with the Government Paperwork Elimination Act, the form will be electronically interactive and posted on the Internet. OWCP's bill processing contractor will allow the submission of this information to be made online through the bill processing contractor's web portal at: <https://owcpmed.dol.gov/>. The online information collection and submission process allows more

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expedited collection of the required information by using best practices in information technology. A provider may also print out a paper copy and fax or mail it to OWCP's bill processing contractor.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item A.2 above.

The information collected on this form is not duplicative within OWCP. The respondent is the only source of the information required to allow for electronic payment for medical services to OWCP providers. The information reported on the form will be used by the Treasury Department to transmit payment data by electronic means to a vendor's financial institution for payment of medical services rendered to OWCP's claimants and the Treasury Department has a similar form under OMB Control No. 1510-0056 with the same form number but is a standard form not adaptable for our specific needed, SF 3881. This is modeled after for OWCP purposes because we were not able to use theirs for our specific purposes.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

This information collection is streamlined to obtain the information necessary for the OWCP's bill processing contractor's needs while imposing the minimum burden on respondents. It does not have a significant economic impact on a substantial number of small entities.

6. Describe the consequence to federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The information requested from respondents is the minimum needed to meet the bill processing needs of the four programs and is only collected on an occasional basis (after the first response, the information is only collected if there is a change in the information concerning the medical provider's financial institution). Payment for bills regarding medical and vocational rehabilitation services provided to beneficiaries cannot be processed for payment by OWCP's bill processing contractor without the information collection. Failure to collect this data would result in delayed manual payments to respondents. If this information is not obtained, when a provider submits their bill for payment, the bill payment process is substantially prolonged and increases the burden on providers to obtain payment for services rendered.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**

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- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances for conducting this information collection.

8. If applicable, provide a copy and identify the date and page number of publication, in the *Federal Register* of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

OWCP consulted with the internal and external users of the forms in this collection. The consultation asked for their feedback on the burden estimates for information collection activities associated with the proposed OWCP-3881. None of the parties OWCP consulted had any changes or comments on the estimated burden so OWCP is proceeding with the initial estimates contained in the 60-day notice published in the Federal Register on October 31, 2024 (89 FR 86841). No comments on the 60-day notice were received. The individuals consulted about the information collection in OMB Control No. 1240-0NEW are listed in the table below:

Contact	Organization	Email	Phone
Janice XXXX	Penrod Medical Equipment	XXX	XXX
Amrit XXXX	Acting Account & Financial Management Section Branch of Fiscal Operations and Technical Support	XXX	XXX
Stephanie XXXX	Giving Home Health Care	XXX	XXX

9. Explain any decision to provide any payments or gifts to respondents, other than remuneration of contractors or grantees.

Respondents do not receive any gifts or payments to furnish the requested information.

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10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The information collected by this form is maintained in OWCP claim files which are fully protected under the Privacy Act. The applicable Privacy Act System of Records are (FECA) DOL/GOVT-1, (Longshore) DOL/OWCP-3 and DOL/OWCP-4, (FECA) DOL/GOVT-1, DOL/OWCP-2 (Black Lung) and DOL/OWCP-11 (Energy).

Reference: <https://www.dol.gov/agencies/sol/privacy>

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature (as described in paragraph 11 above) on this form.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

Estimated Annualized Respondent Cost and Hour Burden

Activity	No. of Respondents	No. of Responses per Respondent	Total Responses	Average Burden (Hours)	Total Burden (Hours)	Hourly Wage Rate	Monetized Value of Time
Form OWCP 3881	35,424	1	35,424	(3 minutes) .05 hours	1,771	\$39.83	\$70,539

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NOTE Hourly Wage Rate: Professional and Business Services Average for 2023.

Hourly Wage Rate: [Table B-3. Average hourly and weekly earnings of all employees on private nonfarm payrolls by industry sector, seasonally adjusted - 2024 M02 Results \(bls.gov\)](#)

The following burden estimates for the three programs are compiled from January 2022 – December 2023.

Electronic: Approximately 12,440 respondents submitted an EFT/ACH form electronically for new enrollment. It is estimated that each Form OWCP-3881 takes up to 3 minutes for the respondent to prepare, which results in an annual hour burden of 622 hours (12,440 responses x 3 minutes = 37,320/60 minutes = 622 hours).

Electronic Submission (New) = 622 hours

Paper: Approximately 30 respondents submitted an EFT/ACH form via paper for new enrollment. It is estimated that each Form OWCP-3881 takes up to 3 minutes for a respondent to prepare, which results in an annual hour burden of 1.5 hours (30 responses x 3 minutes = 90/60 minutes = 1.5 hours or 2 hours rounded).

Paper Submission (New) = 2 hours

Electronic: Approximately 22,519 respondents submitted an EFT/ACH for a modification to their enrollment. It is estimated that each Form OWCP-3881 takes up to 3 minutes for the respondent to prepare, which results in an annual hour burden of 1,125.95 hours (22,519 responses x 3 minutes = 67,557/60 minutes = 1,125.95 hours or 1,126 rounded).

Electronic Enrollment (Modification) = 1,126 hours

Paper: Approximately 435 respondents submitted an EFT/ACH for a modification to their enrollment via paper. It is estimated that each Form OWCP-3881 takes up to 3 minutes for the respondent to prepare, which results in an annual hour burden of 1,305 hours (435 responses x 3 minutes = 1,305/60 minutes = 21.75 hours or 22 rounded).

Paper Enrollment (Modification) = 22 hours

Combining the number of respondents and burden hours for these programs, Form OWCP-3881 has a total of 35,424 respondents (12,440 + 30 + 22,519 + 435 = 35,424), and therefore a total of 35,424 responses and a respondent annual burden of 1,771 hours (622 + 2 + 1,126 + 22 = 1,771).

Using the 2023 hourly wage reported for general clerical work in offices and clinics of medical doctors (based on Bureau of Labor Statistics current data for February 2023 (<https://www.bls.gov/oes/current/oes439199.htm>) of \$39.83 per hour, the respondent annualized cost estimate for this collection is \$70,538.93 or \$70,539 rounded (1,771 x 39.83).

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13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of service component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

There are no startup costs for this information collection. Operation and maintenance costs consist of solely mailing costs. The response cost is \$ 0.78 per response; however, electronically uploaded responses using OWCP's billing contractor's web portal is approximately 99%. The total cost for the 1% mailed, is calculated as \$280 as noted below.

Total electronic responses = 35,424 x 99% = 33,068.76 or 33,067 rounded

Total mailed responses = 35,424 x 1% = 354.24 or 354 rounded

Total cost for mailed response = \$279.66 or \$280 rounded (354 mailed responses x .79 (\$0.78 stamp and 1 cent envelope) = \$279.66 or \$280 rounded)

14. Provide estimates of the annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 into a single table.

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The estimated costs to the Federal government of collecting the information on Form OWCP-3881 are set out below:

Mailing/Developmental costs: Providers seeking to enroll under one of OWCP’s benefit programs may print out a copy of Form OWCP-3881 from the Internet. However, based on enrollment data from January 2022 – December 2023, OWCP anticipates that approximately 1% of providers will request a paper form; there will be a mailing cost of \$279.66 or \$280 (rounded) (354 x \$0.79) for these forms to be mailed out to respondents from the government. There are no developmental costs associated with this collection of information.

Processing/Reviewing Costs: OWCP pays its billing contractor \$4.63 to process one Form OWCP-3881. Therefore, OWCP’s cost to have its contractor process 35,424 of these forms is \$164,293 (35,424 forms x \$4.63 = \$164,013).

\$280 (mailing) + \$164,013 (processing) = Total Estimated Federal Cost of **\$164,293**.

15. Explain the reasons for any program changes or adjustments.

This is a new collection and therefore not yet on the OMB inventory. This is a first-time request for approval of the form.

16. For collections of information whose results will be published, outline plans for tabulations, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The data collected with this form will not be published.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The OMB Number and expiration date will be displayed.

18. Explain each exception to the certification statement.

There are no exceptions to certification.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS.

Statistical methods are not used in these collections of information.